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June 9, 2006

Mr. Jonathan Nadler Program Manager II Southern California Association of Governments 818 W. Seventh Street, 12th Floor (Main Office) Los Angeles, CA 90017

Subject:

State Route 57 (SR-57) Northbound Widening Improvements (0F0300)-Particulate Matter Conformity

Dear Mr. Nadler:

The Orange County Transportation Authority (OCTA) proposes to construct improvements to widen northbound State Route 57 (the Orange Freeway) from 0.3 km (0.2 mi) south of Orangethorpe Avenue in the City of Placentia to 0.2 km (0.1 mi) north of Lambert Road in the City of Brea. This project has a length of 7.6 km (4.7 mi), and passes through the Cities of Placentia, Fullerton and Brea, in Orange County, California. In general, the SR-57 Northbound Widening Improvements propose to add one northbound through lane from the Orangethorpe Avenue Exit Ramp to the Lambert Road Entrance Ramp.

On March 10, 2006, the U.S. Environmental Protection Agency (EPA) published a final rule that establishes the transportation conformity criteria and procedures for determining which transportation projects must be analyzed for local air quality impacts in $PM_{2.5}$ and PM_{10} nonattainment and maintenance areas (71 Federal Register [FR] 12458). Transportation conformity is required under Clean Air Act section 176(c) 42 United States Code (U.S.C.) 7506(c) to ensure that federally supported highway and transit project activities are consistent with ("conform to") the purpose of the state quality implementation plan (SIP). EPA's transportation conformity rule (40 Code of Federal Regulations [CFR] 51.390 and Part 93) establishes the criteria and procedures for determining whether transportation activities conform to the SIP. Clean Air Act section 176(c)(1)(B) is the statutory criterion that must be met by all projects in nonattainment and maintenance areas that are subject to transportation conformity. Section 176(c)(1)(B) states that federally-supported transportation projects must not "cause or contribute to any new violation of any standard in any area; increase the frequency or severity of any existing violation of any standard in any area; or delay timely attainment of any standard or any required interim emission reductions or other milestones in any area."

To meet statutory requirements, the March 10, 2006 final rule requires PM_{2.5} and PM₁₀ hot-spot analyses to be performed for projects of air quality concern. Qualitative hot-spot analyses would be done for these projects before appropriate methods and modeling guidance are available and quantitative PM_{2.5} and PM₁₀ hot-spot analyses are required under 40 CFR 93.123(b)(4). In addition, through the final rule, EPA determined that projects not identified in 40 CFR 93.123(b)(1) as projects of air quality concern have also met statutory requirements

without any further hot-spot analyses (40 CFR 93.116(a)). The final rule defines the projects of air quality concern that require a PM_{2.5} and PM₁₀ hot-spot analysis in 40 CFR 93.123(b)(1) as:¹

- (i) New or expanded highway projects that have a significant number of or significant increase in diesel vehicles;
- (ii) Projects affecting intersections that are at Level-of-Service D, E, or F with a significant number of diesel vehicles, or those that will change to Level-of-Service D, E, or F because of increased traffic volumes from a significant number of diesel vehicles related to the project;
- (iii) New bus and rail terminals and transfer points that have a significant number of diesel vehicles congregating at a single location;
- (iv) Expanded bus and rail terminals and transfer points that significantly increase the number of diesel vehicles congregating at a single location; and
- (v) Projects in or affecting locations, areas, or categories of sites which are identified in the PM_{2.5} or PM₁₀ applicable implementation plan or implementation plan submission, as appropriate, as sites of violation or possible violation.

Conformity determinations require the analysis of direct and indirect emissions associated with the proposed project and compare them to the without project condition. If the total of direct and indirect emissions from the project reaches or exceeds regionally significant thresholds, the Lead Agency must perform a conformity determination to demonstrate the positive conformity of the federal action.

The proposed project would not conflict with an applicable plan, policy, or regulation of an agency with jurisdiction over the project. The proposed project is also consistent with Southern California Association of Governments (SCAG) Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP) and is intended to meet the traffic needs in the area based on local land use plans. Additionally, this project is identified in the freeway chokepoint program and is part of the fast forward initiative being sponsored by OCTA for funding for design and construction. It is proposed as a "Category 4A" project, and is proposed to be paid for by Local, Measure M, funds. The project will be proposed for STIP funds for future phases. This project is needed to maintain acceptable level of service (LOS), and to implement part of the improvements recommended in the Transportation Concept Report (formerly Route Concept Report) for State Route 57 Freeway, which was approved in 1999.

By Year 2030, daily traffic volumes within the project area range from more than 144,000 to 158,000 vehicles per day, with peak hour volumes ranging from 11,700 to nearly 13,600 vehicles in the mixed-flow lanes and 3,000 vehicles in the HOV lane. Without any improvements to the freeway, a failing level of service (LOS F) is expected throughout the project area. The proposed improvements will improve local circulation and access through this vital corridor. Although the SR-57 mainline experiences two-way volumes in excess of 200,000 vehicles per day (vpd), the total volume of heavy truck and diesel traffic is expected to seven (7) percent of the total ADT under existing and forecast Year 2030 conditions. Note that this segment of SR-57 does not serve any ports, rail yards or other significant sources of particulate matter.

Based upon the information provided above, the project is not expected to introduce significant amounts of diesel truck traffic to the area and is <u>not considered a project of significant concern</u>

¹ U.S. Environmental Protection Agency and Federal Highway Administration, *Transportation Conformity Guidance for Qualitative Hot-Spot Analyses in PM*₁₀ and PM_{2.5} Nonattainment and Maintenance Areas, (PM₁₀ Protocol), March 2006, Appendix A.

Mr. Jonathan Nadler June 9, 2006 Page 3

per the definition contained within 40 CFR 93.123(b)(1). Thus, a less than significant impact with respect to $PM_{2.5}$ and PM_{10} would occur. OCTA respectfully requests SCAG's consideration and acceptance of this letter as formal validation of the project's insignificant contribution of $PM_{2.5}$. To facilitate review by the Transportation Conformity Working Group, we are attaching the *PM Conformity Hot Spot Analysis – Project Summary for Interagency Consultation* form with detailed information supporting our conclusion.

Sincerely,

Arshad M. Rashedi, P.E., PMP Section Manager, Project Development Orange County Transportation Authority

Attachments

cc: Jennifer Bergener, Capital Programs - OCTA
Darrell Johnson, Programming, Development and Commuter Rail – OCTA
Bo Burick, SR -57 Consultant Project Manager – RBF
Leslie Manderscheid, Environmental Planning - Caltrans

PM Conformity Hot Spot Analysis – Project Summary for Interagency Consultation

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Project Description from TIP, RTP, and/or project documents MPO ID#: ORA120332									A120332	
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Type of project	ct see i	list below								
Change to existing	g state h	nighway								
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Orange		Between 0.3 km (0.2 mi) South of Orangethorpe Avenue to 0.2 km (0.1 mi) North of Lambert Road 12-ORA-57 KP 26.4 / 34.0 (PM 16.4 / 21.1)								
	Caltrans Projects – EA#: 0F0300									
Lead Agency:	Orang	je County Transi	oortation Auth	ority						
Contact Person Arshad Rashedi			Phone# 714.560.5874		Fax# 714.560.5794		Email arashedi@octa.net			
Decision Desi	red Cl	heck appropriat	e box below							
PM2.5 MAYBE Pro		pject of Air Quality Concer		Concern	Х	NOT Project of Air Quality Con		ıality Concern		
PM10		MAYBE Pro	ect of Air Q	uality	Concern	Х	NOT Project of	t of Air Quality Concern		
Federal Action	ı for v	hich PM Ana	alysis is Ne	eeded	Check ap	propriate	box and describe	in Com	ments below	
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Project Purpose and Need (Summary): Attach additional sheets as necessary

The purpose of the proposed SR-57 Northbound Widening Project, from the Orangethorpe Avenue exit ramp to the Lambert Road entrance ramp, is to improve both existing and future mobility, reduce congestion, improve mainline weaving, merge and diverge movements without substantial acquisition of right of way. Without any improvements to the freeway, a failing level of service (LOS F) is expected throughout the project area. Refer to Attachment A (Additional Information) for an expanded summary.

Surrounding Land Use/Traffic Generators

SR-57 is one of the principal freeways connecting Orange County with the eastern part of Los Angeles County and the adjacent portion of San Bernardino County and directly serves a number of major traffic generators including California State University at Fullerton, the Arrowhead "Pond" of Anaheim, Edison International Field of Anaheim baseball stadium, the Brea Mall Shopping Center and Craig Regional Park. The part of State Route 57 Freeway which continues north into Los Angeles County directly serves California State Polytechnic University at Pomona, the Lanterman State Developmental Center and Frank G. Bonelli Regional County Park.

LOS, AADT, % trucks, truck AADT of proposed facility (opening year)

Refer to Exhibit 1 (SR-57 Existing Average Daily Traffic [ADT] Volumes) within Attachment B (ADT Exhibits). As noted within Exhibit 1, the two-way AADT along the mainline of SR-57 ranges from 202,500 (north of Lambert Road) to 283,500 (south of Orangethorpe Avenue). Heavy trucks along SR-57 account for 7 percent of the overall volume (note that recreational vehicles are also accounted for in this classification). Additionally, all of the study freeway segments are forecast to operate at LOS F for forecast year 2030 without Project conditions and two segments are improved with Project conditions. Refer to Attachment A (Additional Information) for a detailed summary of the ADT, truck percentage and LOS.

LOS, AADT, % trucks, truck AADT of proposed facility (RTP horizon year)

Refer to Exhibit 2 (SR-57 Forecast Year 2030 Average Daily Traffic [ADT] Volumes) within Attachment B (ADT Exhibits). As noted within Exhibit 2, the two-way AADT along the mainline of SR-57 ranges from 284,588 (Yorba Linda Boulevard to Imperial Highway) to 303,912 (south of Orangethorpe Avenue). Heavy trucks along SR-57 account for 7 percent of the overall volume (note that recreational vehicles are also accounted for in this classification). Additionally, the LOS for two segments is improved with Project conditions. Refer to Attachment A (Additional Information) for an a detailed summary of the ADT, truck percentage and LOS.

If facility is interchange(s) or intersection(s), cross-street AADT, % trucks, truck AADT (opening

vear): Not Applicable

If facility is interchange(s) or intersection(s), cross-street AADT, % trucks, truck AADT (RTP

horizon year): Not Applicable

Describe potential traffic redistribution effects of congestion relief

Based upon the scope of the proposed improvements, localized traffic will not be redistributed. Additionally, traffic volumes are forecast to improve under the horizon year (2030) scenario. Refer to Attachment A (Additional Information) for an expanded summary.

Comments/Explanation/Details

Attach additional sheets as necessary; include narrative reason why POAQC or Not POAQC decision is appropriate

Conformity determinations require the analysis of direct and indirect emissions associated with the proposed project and compare them to the without project condition. If the total of direct and indirect emissions from the project reaches or exceeds regionally significant thresholds, the Lead Agency must perform a conformity determination to demonstrate the positive conformity of the federal action.

The proposed project would not conflict with an applicable plan, policy, or regulation of an agency with jurisdiction over the project. The proposed project is also consistent with Southern California Association of Governments (SCAG) Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP) and is intended to meet the traffic needs in the area based on local land use plans. Additionally, this project is identified in the freeway chokepoint program and is part of the fast forward initiative being sponsored by the Orange County Transportation Authority (OCTA) for funding for design and construction. It is proposed as a "Category 4A" project, and is proposed to be paid for by Orange County Measure "M" funds and/or RTIP funds. This project is needed to maintain acceptable level of service (LOS), and to implement part of the improvements recommended in the Transportation Concept Report (formerly Route Concept Report) for State Route 57 Freeway, which was approved in 1999.

As noted above under "Purpose and Need", by Year 2030, daily traffic volumes within the project area range from more than 144,000 to 158,000 vehicles per day, with peak hour volumes ranging from 11,700 to nearly 13,600 vehicles in the mixed-flow lanes and 3,000 vehicles in the HOV lane. Without any improvements to the freeway, a failing level of service (LOS F) is expected throughout the project area. The proposed improvements will improve local circulation and access through this vital corridor. Although the SR-57 mainline experiences two-way volumes in excess of 200,000 vehicles per day (vpd), the total volume of heavy truck and diesel traffic is expected to seven (7) percent of the total ADT under existing and forecast Year 2030 conditions. Note that this segment of SR-57 does not serves any ports, rail yards or other significant sources of particulate matter.

Based upon the information provided above, the project is not expected to introduce significant amounts of diesel truck traffic and is not considered a project of significant concern per the definition contained within 40 CFR 93.123(b)(1). Thus, a less than significant impact with respect to PM_{2.5} and PM₁₀ would occur.

TYPE OF PROJECT:

New state highway: Change to existing state highway

New regionally significant street; Change to existing regionally significant street

New interchange; Reconfigure existing interchange

Intersection channelization Intersection signalization Roadway realignment

Bus, rail, or inter-modal facility/terminal/transfer point

REFERENCE:

Criteria for Projects of Air Quality Concern (40 CFR 93.123(b)(1)) - PM₁₀ and PM_{2.5} hot spots

- (i) New or expanded highway projects that have a significant number of or significant increase in diesel vehicles;
- (ii) Projects affecting intersections that are at Level-of-Service D, E, or F with a significant number of diesel vehicles, or those that will change to Level-of-Service D, E, or F because of increased traffic volumes from a significant number of diesel vehicles related to the project;
- (iii) New bus and rail terminals and transfer points than have a significant number of diesel vehicles congregating at a single location;
- (iv) Expanded bus and rail terminals and transfer points that significantly increase the number of diesel vehicles congregating at a single location; and
- (v) Projects in or affecting locations, areas, or categories of sites which are identified in the PM10 or PM2.5 applicable implementation plan or implementation plan submission, as appropriate, as sites of violation or possible violation.

Attachment A Additional Information

ATTACHMENT A - ADDITIONAL INFORMATION

This Attachment is intended to supplement the information contained within the *PM Conformity Hot Spot Analysis – Project Summary for Interagency Consultation* form.

PROJECT DESCRIPTION

The Orange County Transportation Authority (OCTA) proposes to construct improvements to widen northbound State Route 57 (the Orange Freeway) from 0.3 km (0.2 mi) south of Orangethorpe Avenue in the City of Placentia to 0.2 km (0.1 mi) north of Lambert Road in the City of Brea. This project has a length of 7.6 km (4.7 mi), and passes through the Cities of Placentia, Fullerton and Brea, in Orange County, California.

In general, the SR-57 Northbound Widening Improvements propose to add one northbound through lane from the Orangethorpe Avenue Exit Ramp to the Lambert Avenue Entrance Ramp. Details of the proposed improvements are as follows:

- 1. Orangethorpe Avenue Exit Ramp to Orangethorpe Avenue Entrance Ramp: The existing facility provides (1) HOV lane and (5) mixed-flow lanes. The Project will add (1) mixed-flow lane. The proposed facility will provide (1) HOV lane and (6) mixed-flow lanes.
- 2. Orangethorpe Avenue Entrance Ramp to Chapman Avenue Exit Ramp: The existing facility provides (1) HOV lane, (4) mixed-flow lanes, and (1) auxiliary lane. The Project will add (1) mixed-flow lane. The proposed facility will provide (1) HOV lane, (5) mixed-flow lanes, (1) auxiliary lane and a two-lane exit ramp to Chapman Avenue.
- 3. Chapman Avenue Exit Ramp to Nutwood Avenue Entrance Ramp: The existing facility provides (1) HOV lane and (4) mixed-flow lanes. The Project will add (1) mixed-flow lane. The proposed facility will provide (1) HOV lane and (5) mixed-flow lanes.
- 4. Nutwood Avenue Entrance Ramp to Yorba Linda Boulevard Exit Ramp: The existing facility provides (1) HOV lane, (4) mixed-flow lanes and (1) auxiliary lane. The Project will add (1) mixed-flow lane. The proposed facility will provide (1) HOV lane, (5) mixed-flow lanes and (1) auxiliary lane.
- 5. Yorba Linda Boulevard Exit Ramp to Yorba Linda Boulevard North Entrance Ramp: The existing facility provides (1) HOV lane and (4) mixed-flow lanes. The Project will add (1) mixed-flow lane. The proposed facility will provide (1) HOV lane and (5) mixed-flow lanes.
- 6. Yorba Linda Boulevard North Entrance Ramp to Rolling Hills Drive: The existing facility provides (1) HOV lane and (4) mixed-flow lanes. The Project will add (1) mixed-flow lane. The proposed facility will provide (1) HOV lane and (5) mixed-flow lanes.
- 7. Rolling Hills Drive to Imperial Highway Exit Ramp: The existing facility provides (1) HOV lane and (4) mixed-flow lanes. The Project will add (1) mixed-flow lane, (1) auxiliary lane and the Imperial Hwy exit ramp will be reconfigured from a one-lane exit to a two-lane exit. The proposed facility will provide (1) HOV lane, (5) mixed-flow lanes, (1) auxiliary lane and a two-lane exit ramp to Imperial Hwy.
- 8. Imperial Highway Exit Ramp to Imperial Highway South Entrance Ramp: The existing facility provides (1) HOV lane and (4) mixed-flow lanes. The Project will add (1) mixed-flow lane. The proposed facility will provide (1) HOV lane and (5) mixed-flow lanes.
- 9. Imperial Highway South Entrance Ramp to Imperial Highway North Entrance Ramp: The existing facility provides (1) HOV lane and (4) mixed-flow lanes. The Project will add (2) mixed-flow lanes. The proposed facility will provide (1) HOV lane and (6) mixed-flow lanes.
- 10. Imperial Highway North Entrance Ramp to Lambert Road Exit Ramp: The existing facility provides (1) HOV lane and (4) mixed-flow lanes. The Project will add (1) mixed-flow

1

- lane and (1) auxiliary lane. The proposed facility will provide (1) HOV lane, (5) mixed-flow lanes and (1) auxiliary lane.
- 11. Lambert Road Exit Ramp to Lambert Road Entrance Ramp: The existing facility provides (1) HOV lane and (4) mixed-flow lanes. The Project will add (1) mixed-flow lane. The proposed facility will provide (1) HOV lane and (5) mixed-flow lanes.

Alternative 1 will generally provide the proposed improvements in accordance with Caltrans Highway Design Manual requirements. Alternative 2 differs from Alternative 1 principally in the following respects:

- 1. Maintains existing nonstandard median shoulder (generally 0.6 meter in width) north of Orangethorpe Avenue;
- 2. Maintains existing nonstandard 3.35 meter lane widths;

Both build alternatives require limited amounts of right of way acquisition. Alternative 1 requires approximately 515 m² of acquisition at a total of five locations. Alternative 2 requires approximately 24 m² of acquisition at one location.

PROJECT PURPOSE AND NEED

The purpose of the proposed SR-57 Northbound Widening Project, from the Orangethorpe Avenue exit ramp to the Lambert Road entrance ramp, is to improve both existing and future mobility, reduce congestion, improve mainline weaving, merge and diverge movements without substantial acquisition of right of way. The environmental study boundary spans from the SR-91 interchange to north of Lambert Road where traffic generation reduces due to lower population density.

The proposed project is intended to achieve the following goals:

- 1. Maximize mainline mobility and throughput without acquisition of substantial right of way:
- 2. Facilitate regional circulation, flow of goods and services via SR-57;
- 3. Achieve a major component of the OCTA Chokepoint Program: and
- 4. Conform to state, regional, and local plans and policies.

Existing daily traffic volumes within the project area range from more than 101,000 to 142,000 vehicles per day, with peak hour volumes ranging from 8,300 to nearly 9,900 vehicles in the mixed-flow lanes and over 1,700 vehicles in the HOV lane. Under current traffic conditions, substantial congestion is experienced in the afternoon peak hour period.

By Year 2030, daily traffic volumes within the project area range from more than 144,000 to 158,000 vehicles per day, with peak hour volumes ranging from 11,700 to nearly 13,600 vehicles in the mixed-flow lanes and 3,000 vehicles in the HOV lane. The forecast northbound peak hour traffic volumes in the HOV lane in the Year 2030 is based on a requirement of at least two persons per vehicle. Without any improvements to the freeway, a failing level of service (LOS F) is expected throughout the project area.

This project is supported by OCTA and Caltrans District 12. It is identified in the freeway chokepoint program and is part of the fast forward initiative being sponsored by OCTA for funding for design and construction. It is proposed as a "Category 4A" project. It is anticipated that a Mitigated Negative Declaration/Finding of No Substantial Impact (MND/FONSI) would satisfy the environmental compliance for CEQA and NEPA. This project is tentatively proposed to be funded by Orange County Measure "M" funds and/or Regional Transportation

Improvement Program (RTIP) funds. The PA/ED phase of the project is scheduled for completion in May 2007. This project would serve to implement part of the improvements recommended in the Transportation Concept Report (formerly Route Concept Report for SR-57).

This is considered to be State-Authorized under current the FHWA/Caltrans Stewardship Agreement.

LOS, AADT, % TRUCKS, TRUCK AADT OF PROPOSED FACILITY

Table 1 Truck Percentages

#	Roadway Segment	Truck Percent Values
1	SR –57 Mainline	7%
2	Orangethorpe Avenue Off-Ramp	2%
3	Orangethorpe Avenue On-ramp	2%
4	Chapman Avenue Off-Ramp	2%
5	Nutwood Avenue Off-Ramp	1%
6	Nutwood Avenue On-Ramp	2%
7	Yorba Linda Boulevard Off-Ramp	2%
8	Eastbound Yorba Linda Boulevard On-Ramp	2%
9	Westbound Yorba Linda Boulevard On-Ramp	2%
10	Imperial Highway Off-Ramp	5%
11	Eastbound Imperial Highway On-Ramp	5%
12	Westbound Imperial Highway On-Ramp	5%
13	Lambert Road Off-Ramp	5%
Sourc	e: Steve Kinaly, Caltrans District 12, May 2006.	

Table 2
Freeway Segment PM Peak Hour Level of Service

9	Existing Co	onditions	Year 20 Without P	Service and Advanced	Year 2030 With Project	
Ramp	Density (pc/mi/ln)	LOS	Density (pc/mi/ln)	LOS	Density (pc/mi/ln)	LOS
Orangethorpe Ave to Chapman Ave	35.8	Ε	OVRFL	F	OVRFL	F
Chapman Ave to Nutwood Ave	41.5	Ε	OVRFL	F	OVRFL	F
Nutwood Ave to Yorba Linda Blvd	31.4	D	OVRFL.	F	38.1	E
Yorba Linda Blvd to Imperial Hwy	42.9	E	OVRFL	F	OVRFL	F
Imperial Hwy to Lambert Rd	41.0	E	OVRFL	F	36.5	E

Source: Traffic Impact Analysis, January 31, 2006.

Note: pc/mi/ln = passenger cars per mile per lane; OVRFL= Density exceeds calculation of software program.

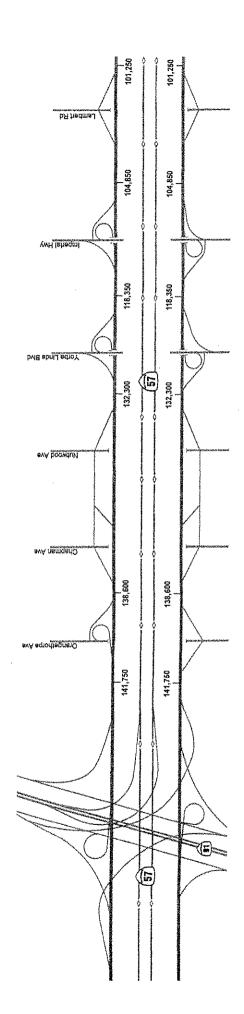
DESCRIBE POTENTIAL TRAFFIC REDISTRIBUTION EFFECTS OF CONGESTION RELIEF

During construction, changes will be made in the position of lanes and the cross section of the northbound lanes of the freeway. All lanes, except the outermost mixed-flow lane, will be reduced to 3.35 meters in width. No reductions in the number of travel lanes, freeway closures, intersecting road closures, or rail closures are anticipated. Temporary reductions or closures may occur at the (1) beginning of construction, when barriers are being moved into position; (2) during re-striping, when falsework is being installed or removed; or (3) at the end, when the freeway is being restored to its completed condition. These closures would be limited to

between 10:00 p.m. and 5:00 a.m., and adequate notification will be required. No detours are planned for this project, with the exception of temporary closures necessary for re-striping, placement of falsework, etc

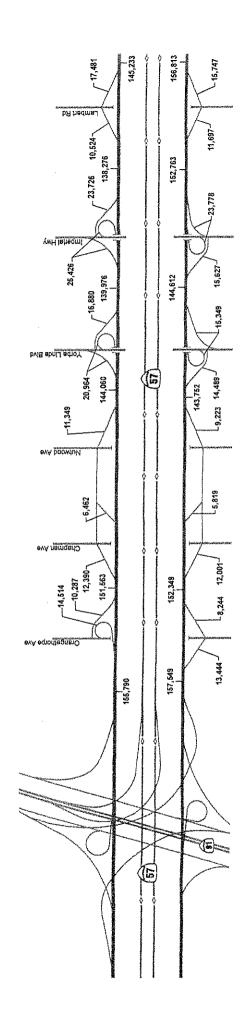
Once operational, there are not any anticipated long-term shifts in the planned land use types. The proposed project will improve vehicular circulation within portions of the cities of Fullerton, Placentia, and Brea that are densely populated. The proposed project would not induce development in the project area. Additionally, projects are proposed to the north and south of the proposed project that would widen northbound SR-57. Thus, this project is compatible with potential future improvements along SR-57. Specifically, a Project Study Report (PSR) was prepared by Caltrans, and approved in September 2001, to add a minimum of one northbound climbing land (a fifth and possibly a sixth mixed-flow climbing lane) from Lambert Road approximately 1 km (0.62 mi) north of the Orange County/Los Angeles County line.

Attachment B ADT Exhibits



XXX - Existing Average Daily Traffic Volume Source: Orange County Transportation Authority.





XXX - Forecast Year 2030 Average Daily Traffic Volume

Source: Orange County Transportation Authority.